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**From:** Abram Carls  
**Sent:** Friday, January 12, 2024 8:25 PM  
**To:** Jeffrey D. Goetz; Janczak, Elizabeth  
**Cc:** Joe Peiffer (ABLS); Austin Peiffer (ABLS) (austin@ablsonline.com); Timothy N. Lillwitz; Jordan A. Kroop; Jason Rosell; Brenda F. Mozena; Nicholas J. Valley; Theresa L. Birch  
**Subject:** RE: Responses to Discovery

Jeff, what is this? I'm finding 24 emails that look like an irrelevant dump and not the information I requested. Please say what emails go with what request (see FRCP 34(2)(E)(i) (requiring Zayo to "organize and label" "to correspond to the categories in the request")), and identify whether any information is being withheld. It is frustrating to ask for this information re-repeatedly to no avail, particularly when Zayo is required by rule to provide it.

Jury work took me beyond budgeted time today. Look for the continuance motion over the weekend. Please provide your availability in February for a hearing.

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**From:** Jeffrey D. Goetz <Goetz.Jeffrey@bradshawlaw.com>  
**Sent:** Friday, January 12, 2024 3:42 PM  
**To:** Abram Carls <acarls@spmbllaw.com>; Janczak, Elizabeth <ejanczak@sgrlaw.com>  
**Cc:** Joe Peiffer (ABLS) <joe@ablsonline.com>; Austin Peiffer (ABLS) (austin@ablsonline.com) <austin@ablsonline.com>; Timothy N. Lillwitz <Lillwitz.Timothy@bradshawlaw.com>; Jordan A. Kroop <Jkroop@pszjlaw.com>; Jason Rosell <jrosell@pszjlaw.com>; Brenda F. Mozena <Mozena.Brenda@bradshawlaw.com>; Nicholas J. Valley <Valley.Nicholas@bradshawlaw.com>; Theresa L. Birch <Birch.Theresa@bradshawlaw.com>  
**Subject:** Responses to Discovery

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**ShareFile Attachments Sent By Bradshaw, Fowler,  
Proctor & Fairgrave, P.C.**

Expires July 10,  
2024

Zayo Discovery.zip

11.4 MB

[Download Attachments](#)

Jeffrey Goetz uses ShareFile to share documents securely.

**Jeffrey D. Goetz**  
Attorney At Law



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